Mr. Tris Gour
AMPCOR II, Inc.
P.O. Box 87
LaPorte, Indiana 46352

Re: 091-12087-00052
Minor Source Modification to:
Part 70 permit No.: T091-7804-00052

Dear Mr. Gour:

AMPCOR II, Inc. was issued Part 70 operating permit T091-7804-00052 on February 9, 1999 for a casket hardware manufacturing plant. An application to modify the source was received on March 24, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

(a) One (1) new thermal oxidizer, with a heat input rate of 3.5 million British Thermal Units per hour (mmBtu/hr), to control the VOC emissions from the one (1) permitted electrostatic rotating disk paint system, identified as CC, with a maximum capacity to paint 1500 units per hour, using dry filters for particulate matter control.

This oxidizer will be installed in order for the source to meet the compliance schedule stated in Condition D.1.4(b) to comply with the VOC limits in condition D.1.1 of the issued Part 70 permit T091-7804-00052 required in rule 326 IAC 8-2-9.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The proposed operating conditions applicable to these emission units are attached to this Source Modification approval. These proposed operating conditions shall be incorporated into the Part 70 operating permit as an administrative amendment in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-11.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
APD
cc: File -LaPorte County
U.S. EPA, Region V
LaPorte County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 MINOR SOURCE MODIFICATION
OFFICE OF AIR MANAGEMENT

AMPCOR II, Inc.
105 Koomler Drive
LaPorte, Indiana 46350

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

1st Minor Source Modification No.: 091-12087-00052	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

TABLE OF CONTENTS

(f) One (1) new thermal oxidizer, with a heat input rate of 3.5 million British Thermal Units per hour (mmBtu/hr), to control the VOC emissions from the one (1) permitted electrostatic rotating disk paint system, identified as CC, with a maximum capacity to paint 1500 units per hour, using dry filters for particulate matter control.

This control equipment will be installed in order for the source to meet the compliance schedule stated in Condition D.1.4(b) to comply with the VOC limits in condition D.1.1 of the issued Part 70 permit T091-7804-00052 required in rule 326 IAC 8-2-9.

GENERAL CONSTRUCTION CONDITIONS

1. Permit No Defense [IC 13]

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

2 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

3. Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-7-5(1)]

5. Volatile Organic Compounds (VOC) [326 IA. 8-2-9]

(a) Pursuant to 326 IA. 8-2-9 (Miscellaneous Metal Coating), the volatile organic compound (VOC) content of coating delivered to CC shall be limited as follows:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Clear Coat	4.3
Air Dried Coat	3.5
Forced Warm Air Dried Coat	3.5
Extreme Performance Coat	3.5
All Other Coat	3.0

(b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) Based upon 326 IA. 8-1-2(c) and the overall control efficiency of 88%, the VOC content of the coating shall not exceed 58.4 per gallon of coating solids delivered to the applicator.

Compliance Determination Requirements

6. Testing Requirements [326 IA. 2-7-6(1),(6)][326 IA. 2-1.1-11]

(a) Compliance stack tests shall be performed on the thermal oxidizer to determine the operating temperature that will achieve its destruction efficiency and the capture system efficiency of the electrostatic rotating disk paint system, identified as CC . The determination of these operating parameters shall verify the overall control system of 88%.

(b) The Compliance stack tests for (a) of this condition shall be made utilizing Method 204 for capture efficiency and Method 25 for destruction efficiency, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

(c) The compliance tests required in (a) and (b) of this condition shall be made within 60 days after achieving maximum production rate, but no later than 180 days after the installation of the thermal oxidizer.

7. Thermal Oxidizer

(a) The thermal oxidizer shall operate at all times that the process is in operation. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1350 ^{0}F during operation until a temperature and fan amperage has been determined from the most recent compliance stack test, as approved by IDEM. The temperature correlates to an overall VOC control efficiency of 88% based on the stack capture and destruction efficiency.

(b) When operating the thermal oxidizer to achieve compliance with 326 IA. 8-2-9, (4.3 when using clear coating, 3.5 when using extreme performance coating, or 3.0 for all other coatings) pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain an overall control efficiency of 88%. This control efficiency and the use of the thermal oxidizer are required by rule 326 IA. 8-1-2(a)(2).

8. Thermal Oxidizer Parametric Monitoring

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained at a range established in the most recent compliance stack test.

(c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading.

9. Record Keeping Requirements

(a) To document compliance with Condition no. 1, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition no.1

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(6) The continuous temperature records for the thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test.

(7) Weekly records of the duct pressure or fan amperage.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this Part 70 permit.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Minor Part 70 Source Modification

Source Background and Description

Source Name:	AMPCOR II, Inc.	
Source Location:	105 Koomler Drive, LaPorte, Indiana 46350	
County:	LaPorte	
SIC Code:	3471, 3462, 3089	
Operation Permit No.:	T091-7804-00052	Issuance Date: February 9, 1999
Minor Source Modification No.:	091-12087-00052	
Permit Reviewer:	Aida De Guzman	

The Office of Air Management (OAM) has reviewed a Part 70 source modification application from AMPCOR II, Inc. relating to the construction and operation of the following equipment:

(a) One (1) new thermal oxidizer, with a heat input rate of 3.5 million British Thermal Units per hour (mmBtu/hr), to control the VOC emissions from the one (1) permitted electrostatic rotating disk paint system, identified as CC, with a maximum capacity to paint 1500 units per hour, using dry filters for particulate matter control.

This control equipment will be installed in order for the source to meet the compliance schedule stated in Condition D.1.4(b), to comply with the VOC limits in condition D.1.1 of the issued Part 70 permit T091-7804-00052 required in rule 326 IAC 8-2-9.

Recommendation

The staff recommends to the Commissioner that the Part 70 source modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A permit application for the purposes of this review was received on March 24, 2000. Additional information via e-mail was received on April 25, 2000, via fax on May 25, 2000, and June 22, 2000.

Emission Calculations

(b) Thermal Oxidizer Combustion Emissions: See Page 1 of 1 TSD Appendix A, for detailed calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO_2	0.0
VOC	0.1
CO	1.3
NO_x	1.5

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Justification for Modification

The Title V permit is being modified through a Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(3) "modification involving a pollution control project or pollution prevention project as defined in 326 IAC 2-1.1-1 that do not increase the potential to emit of any regulated pollutant greater than the threshold under subdivision (4), but requires a significant change in the method or methods to demonstrate or monitor compliance.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects Ampcor II's 1995 emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.022
PM-10	0.022
SO_2	N/A
VOC	24.93
CO	N/A
NO_x	N/A
Copper Compounds	0.39
Nickel Compounds	0.13
MEK	0.75
Toluene	4.36
Ethylene Glycol	0.05
Xylene	3.17
MIK	1.01
Glycol Ethers	1.36

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)

Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Thermal Oxidizer	0.0	0.0	0.0	0.1	1.3	1.5	0.0
Total Emissions	0.0	0.0	0.0	0.1	1.3	1.5	0.0

County Attainment Status

The source is located in LaPorte County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	attainment
SO_2	maintenance
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	not determined

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) LaPorte County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Part 70 Permit Conditions

The source has been issued a Part 70 Permit 091-7804-00052, on February 9, 1999.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this thermal oxidizer.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability

(a) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
Currently, the source's coatings are not in compliance with the 3.5 pounds per gallon limit, specified in condition D.1.1 of the issued Part 70 permit T091-7804-00052 to comply with rule 326 IA. 8-2-9. Because of noncompliance, the source has to meet the compliance schedule set in condition D.1.4 of the issued Part 70. The proposed construction of the thermal oxidizer will make the source comply with 326 IA. 8-2-9.

The table below shows the noncompliant coatings used by the electrostatic rotating disk paint system, identified as CC, that was permitted under the Part 70 permit T091-7804-00052, issued on February 9, 1999.

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (gal/hour	Pounds VOC per gallon of Coating less water	Pounds VOC per gallon of Coating	Pot'l VOC pounds/hr	Pot'l VOC pounds/day	Pot'l VOC tons/yr	Particulate Pot'l tons/yr	lb VOC/gal solids	Transfer Efficiency
CC Clean Up Solvent	8.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.00027	"1500	"8.34	"8.34	"3.43	"82.24	"15.01	"0.00	-	"80%
CC Silver One Coat	7.5	83.75%	0.0%	83.8%	0.0%	12.63%	0.00017	"1500	"6.29	"6.29	"1.57	"37.59	"6.88	""0.27	"49.8	"80%
CC Light Antique Gold Dye Topcoat	7.4	84.77%	0.0%	84.8%	0.0%	11.92%	0.00004	"1500	"6.29	"6.29	"0.37	"9.00	"1.64	"0.06	"52.77	"80%
CC Antique Gold Dye	7.4	84.91%	0.0%	84.9%	0.0%	11.82%	0.00027	"1500	"6.30	"6.30	"2.59	"62.13	""11.34	"0.40	"53.3	"80%
CC Bronze One Coat	7.5	83.94%	0.0%	83.9%	0.0%	12.20%	0.00002	"1500	"6.27	"6.27	"0.23	"5.55	"1.01	"0.04	"51.4	"80%
CC Copper One Coat	7.5	83.53%	0.0%	83.5%	0.0%	11.51%	0.00001	"1500	"6.29	"6.29	"0.11	"2.66	"0.49	"0.02	"54.65	"80%
CC Gold One Coat	7.5	90.54%	0.0%	90.5%	0.0%	6.73%	0.00003	"1500	"6.80	"6.80	"0.28	"6.77	"1.24	"0.03	"101.03	"80%
CC Yellow Dye	7.7	82.06%	0.0%	82.1%	0.0%	17.49%	0.00000	"1500	"6.30	"6.30	"0.00	"0.10	"0.02	"0.00	"36.03	"80%
Volume Weighted Average	*7.4*	*84.40%*	*0.0%*	*84.4%*	*0.0%*	*10.70%*	*0.00017*	*"1500*	*"6.29*	*"6.29*	*"1.60*	*"38.5*	*"7.02*	*"0.03*	58.40000	"80%

The equivalent emission limit in pounds of VOC per gallon coating solids using one of the compliance methods in 326 IAC 8-1-2, which in this case, is the use of a thermal oxidizer is determined by the following equation:

$$E = \frac{L}{1 - L/D}$$

$$= \frac{3.5}{1 - 3.5/6.99}$$

= 7.01 lb/gal solids

Where:

L = Applicable emission limit in pounds of VOC per gallon coating (lb/gal)
= 3.5 lb/gallon

D = Density of VOC in coating in pounds per gallon of VOC
= Density, lb/gal * Wt % org. * 1/1-vol % solids
= 7.4 lb coat/gal * 84.4% * 1/100-10.70%

100

= 6.99 lb/gal

E = 7.4, equivalent emission limit in pounds of VOC per gallon of coating solids applied.

The equivalent overall efficiency of the capture system and control device as a percentage needed in order to meet the emission limitation is determined by the following equation:

$$O = \frac{V - E}{V} * 100$$

$$= \frac{58.4 - 7.01}{58.4} * 100$$

= 88%

Where:
V = Actual VOC content of the coating or if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in section 4 of this rule in units of pounds of VOC per gallon of coating solids applied
= 58.4 lb/gallon solids

The proposed thermal oxidizer has a destruction efficiency of 99.8%. The source shall have a system capture efficiency of 88%, to achieve an overall efficiency of 88%.

(b) 326 IA. 6-2 (Particulate Emissions Limit for Indirect Heating Units)
This rule does not apply to the proposed thermal oxidizer because it is not a source of indirect heating.

Revision to the Part 70 Permit

(1) The construction of the thermal oxidizer will also result in a revision of the issued Part 70 permit T091-7804-00052, issued on February 9, 1999. The revision is as follows (changes are bolded and deletions are struck-through for emphasis):

(a) A.2 Emission Units and Pollution Control Equipment Summary [326 IA. 2-7-4(c)(3)] [326 IA. 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) **One (1) new thermal oxidizer, with a heat input rate of 3.5 million British Thermal Units per hour (mmBtu/hr), to control the VOC emissions from the** one (1) permitted electrostatic rotating disk paint system, identified as CC, with a maximum capacity to paint 1500 units per hour, using dry filters for particulate matter control.

(2) Section D.1 Facility description table is also revised as follows:

(1) **One (1) new thermal oxidizer, with a heat input rate of 3.5 million British Thermal Units per hour (mmBtu/hr), to control the VOC emissions from** the one (1) permitted electrostatic rotating disk paint system, identified as CC, with a maximum capacity to paint 1500 units per hour, using dry filters for particulate matter control. This control equipment will be installed in order for the source to meet the compliance schedule stated in Condition D.1.4(b) to comply with the VOC limits in condition D.1.1 of the issued Part 70 permit T091-7804-00052 required in rule 326 IAC 8-2-9.

(3) Condition D.1.1 is revised as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IA. 8-2-9]

(a) Pursuant to 326 IA. 8-2-9 (Miscellaneous Metal Coating), the volatile organic compound (VOC) content of coating delivered to CC shall be limited as follows: ~~to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.~~

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Clear Coat	**4.3**
Air Dried Coat	**3.5**
Forced Warm Air Dried Coat	**3.5**
Extreme Performance Coat	**3.5**
All Other Coat	**3.0**

(b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) Based upon 326 IA. 8-1-2(c) and the overall control efficiency of 88%, the VOC content of the coating shall not exceed 58.4 per gallon of coating solids delivered to the applicator.

(4) The source will be in compliance with the VOC limit in Condition D.1.1 by compliance methods under 326 IA. 8-1-2, using thermal oxidizer to control the VOC emissions. Condition D.1.4 is revised and replaces Condition D.1.5 as follows:

Compliance Determination Requirements

D.1.4 ~~Compliance Schedule [326 IA. 2-7-6(3)]~~

~~The Permittee will be considered in compliance with Condition D.1.1 provided that:~~

~~(a) Compliance with 326 IA. 8-2-9 is achieved on or before October 16, 1999.~~

~~(b) The following color coatings are projected to be used on the electrostatic line. Target dates for matching these compliant colors, to be provided by the paint supplier, (with their former noncompliant coatings currently in use on the electrostatic system) are as follows:~~

~~COLOR~~	~~Color Match Target Date~~
~~antique gold dye LM7178~~	~~1/15/99~~
~~light antique gold dye (nickel) LM7188~~	~~1/15/99~~
~~silver LM7186~~	~~1/15/99~~
~~white LM7204~~	~~1/15/99~~
~~clearcoat LM7296~~	~~4/15/99~~
~~bronze LM7189~~	~~7/15/99~~
~~coppertone~~	~~7/15/99~~
~~black~~	~~7/15/99~~
~~dark bronze~~	~~7/15/99~~
~~gold~~	~~7/15/99~~

~~(c) The compliant color samples are to be provided for customer approval no later than two (2) weeks after the colors have been matched with the current noncompliant colors.~~

~~(d) Effort must be made to ensure that customer responses and/or approval of the compliant colors are made within forty-five (45) days of sample submission. In the event of customer disapproval, new color matches must be requested from the paint supplier. The tentative dates (pending customer approvals) for production using coatings compliant with 326 IA. 8-2-9 are as follows:~~

~~COLOR~~	~~Production Target Date~~
~~antique gold dye LM7178~~	~~4/15/99~~
~~light antique gold dye (nickel) LM7188~~	~~4/15/99~~
~~silver LM7186~~	~~4/15/99~~
~~white LM7204~~	~~4/15/99~~
~~clearcoat LM7296~~	~~7/15/99~~
~~bronze LM7189~~	~~9/15/99~~
~~coppertone~~	~~9/15/99~~
~~black~~	~~9/15/99~~
~~dark bronze~~	~~9/15/99~~
~~gold~~	~~9/15/99~~

D.1.4 Testing Requirements [326 IA. 2-7-6(1),(6)][326 IA. 2-1.1-11]

(a) Compliance stack tests shall be performed on the thermal oxidizer to determine the operating temperature that will achieve its destruction efficiency and the capture system efficiency of the electrostatic rotating disk paint system, identified as CC . The determination of these operating parameters shall verify the overall control system of 88%:

(b) The Compliance stack tests for (a) of this condition shall be made utilizing Method 204 for capture efficiency and Method 25 for destruction efficiency, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

(c) The compliance tests required in (a) and (b) of this condition shall be made within 60 days after achieving maximum production rate, but no later than 180 days after the installation of the thermal oxidizer.

D1.5 Thermal Oxidizer

(a) The thermal oxidizer shall operate at all times that the process is in operation. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1350 ^{0}F during operation until a temperature and fan amperage has been determined from the most recent compliance stack test, as approved by IDEM. The temperature correlates to an overall VOC control efficiency of 88% based on the stack capture and destruction efficiency.

(b) When operating the thermal oxidizer to achieve compliance with 326 IA. 8-2-9, (4.3 when using clear coating, 3.5 when using extreme performance coating, or 3.0 for all other coatings) pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain an overall control efficiency of 88%. This control efficiency and the use of the thermal oxidizer are required by rule 326 IA. 8-1-2(a)(2).

(5) The following parametric monitoring for the thermal oxidizer will be added in the Part 70 permit and be numbered D.1.9

D.1.9 Thermal Oxidizer Parametric Monitoring

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained at a range established in the most recent compliance stack test.

(c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading.

(6) Condition D.1.9 in the Part 70 permit is re-numbered to D.1.10, and be revised as follows:

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

~~(3) The volume weighted VOC content of the coatings used for each day that any coating with VOC content greater than 3.5 pounds per gallon is used, by:~~

~~$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [Dc * O * Q / [1-W * Dc / Dw]]}{3C}$$~~

~~Dc = density of coating, lb/gal Dw = density of water, lb/gal~~
~~O = weight percent organics, % Q = quantity of coating, gal/unit~~
~~W = percent volume of water, % C = total of coatings used, gal/unit~~

(~~4~~ **3**) The cleanup solvent usage for each month;

(~~5~~ **4)** The total VOC usage for each month; and

(~~6~~ **5**) The weight of VOCs emitted for each compliance period.

(6) The continuous temperature records for the thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test.

(7) Weekly records of the duct pressure or fan amperage.

(b) To document compliance with Conditions D.1.2 and D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(7) The following Reporting Requirements in Condition D.1.10 of the Part 70 permit is deleted , since it is no longer necessary:

D.1.1~~0~~ **1** Reporting Requirements

~~(a) Reports of the status of the color matches from Condition D.1.4 are due February 1, May 1, and August 1 of 1999 to the address listed in Section C - General Reporting Requirements, of this permit. These reports are to explicitly state the reason for any delay in the proposed compliance schedule, and describe efforts to keep the compliance schedule intact.~~

Conclusion

The operation of this casket hardware manufacturing shall be subject to the conditions of the attached proposed **Minor Source Modification No. 091-12089-00052.**